IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 17-22775-GLT

RONALD L MCFEATERS : Chapter 7

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Debtor : Related to Doc. Nos. 21, 22

:

PENNYMAC LOAN SERVICES, LLC

:

Movant

:

v.

:

Ronald L. McFeaters and Natalie Lutz Cardiello, Esquire

:

Respondents

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY OF SECURED CREDITOR

AND NOW comes Natalie Lutz Cardiello, Trustee, by and through her attorney, Natalie Lutz Cardiello, Esquire, and files the within Response to Motion for Relief from the Automatic Stay of Secured Creditor (the "Motion") filed in the above matter.

- 1. The Debtor filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code on July 6, 2017.
- 2. Natalie Lutz Cardiello was duly appointed Interim Trustee and has been so serving.
- 3. The Motion was filed in connection with the Debtor's property located at 102 Ethan Hill Drive, Harrisville, PA 16038 (the "Property").
- 4. The Trustee has recently been working with BK Global in an effort to negotiate carve out arrangements with lenders for the benefit of the Bankruptcy Estate.
- 5. The Trustee does not object to the relief requested by Movant, but requests a reasonable period of time of six months to market and sell the property.
- 6. In the event that the Trustee determines that a sale of the property is not feasible before the expiration of the six month waiting period, the Trustee will file a Report of No Distribution, at which time the Movant can proceed with its requested relief.

WHEREFORE, the Trustee requests that this Honorable Court enter an Order granting the Motion for Relief from the Automatic Stay of Secured Creditor, effective as of June 1, 2018, or at such earlier time as the Trustee files a Report of No Distribution.

Dated: October 19, 2017 Respectfully submitted,

/s/ Natalie Lutz Cardiello
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